

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

CHRISTOPHER LEE CASTANO

Case No. SA-22-MJ-01212

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2012 - 2022 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2251(a)

Sexual Exploitation of Children

Maximum Penalties: 30 years confinement, 15 year mandatory minimum confinement; \$250,000 fine, life supervised release, \$100 mandatory special assessment, \$5,000 JVT assessment, up to \$50,000 pursuant to 18 USC 2259A, restitution, forfeiture, and registration as a sex offender.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Larry Baker, FBI Special Agent

Printed name and title

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: August 11, 2022*Judge's signature*

Elizabeth S. Chestney, U.S. Magistrate Judge

*Printed name and title*City and state: San Antonio, Texas

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Larry Baker, being duly sworn, depose and say that:

1. I am a Special Agent with the Federal Bureau of Investigation and am assigned to the to the Federal Bureau of Investigation ("FBI") San Antonio Child Exploitation Task Force ("SACETF") in the San Antonio Division of the FBI. I have been a Special Agent since January 1999. In my capacity as a member of the SACETF, I am assigned to the Violent Crimes against Children Section and as such, I investigate crimes against children, including the trafficking, possession, and production of child pornography and the sexual exploitation of children. I have received particularized training in the investigation of computer-related crimes, peer-to-peer computer networking, and online (i.e. Internet based) crimes against children. I have been involved in numerous investigations of individuals suspected of producing, distributing and receiving child pornography and have participated in the execution of numerous search warrants which have resulted in the seizure of multiple items of child pornography. I have had the occasion to become directly involved in investigations relating to the sexual exploitation of children and have gained experience in the conduct of such investigations through formal training and on-the-job training.

2. This affidavit is being submitted in support of a Criminal Complaint for **CHRISTOPHER LEE CASTANO**, date of birth XX/XX/1981.

3. The factual information supplied in this affidavit is based upon your Affiant's own investigation of this matter, as well as information provided by other law enforcement officers. Since this affidavit is submitted for the purpose of securing an arrest warrant, it does not include every fact known to the affiant concerning this investigation. The affiant has set forth facts that he believes establish probable cause to believe that **CHRISTOPHER LEE CASTANO** has violated the provisions of Title 18, U.S.C., Section 2251 – Sexual Exploitation of Children.

4. On August 10, 2022, a federal search warrant was executed on Castano's person, devices, vehicle and his residence in Universal City, Texas. In addition, Castano and his employer consented to a search of Castano's work area at his place of employment in San Antonio, Texas, on this same date. During the search at his place of employment, Castano was provided his *Miranda* Rights, and subsequently waived them. During a post-*Miranda* interview, Castano advised he first viewed child pornography when he was a teenager and he has received child

pornography files since that time through various Internet based applications such as Limewire and The Onion Router (TOR).

5. The last time Castano received child pornography via TOR was in approximately 2017, when he, while in his place of employment in San Antonio, Texas, used a laptop computer, issued to him by his employer, and his employer's Internet connection, to access the TOR and download child pornography. The child pornography received during this event is stored on multiple devices owned and operated by Castano, including a Samsung brand external hard drive and a Patriot brand USB drive. Castano stated he most recently viewed child pornography last week at his place of employment.

6. Beginning on or about 2015, Castano concealed a water-proof camera in a box inside a bathroom in his current residence in Universal City, Texas, to produce images and videos of a then approximately 12-year-old female, referred to hereafter as Child Victim #1 (CV1), in a nude state. Castano also placed his cellular telephone in the air gap between the door and floor in this same bathroom in order to produce images of CV1 in a nude state. Castano admitted producing images and videos of CV1 in a nude state in this bathroom utilizing this concealed device and his cellular telephone from approximately 2015 through approximately 2018. Castano is still in possession of many of these images and videos of CV1.

7. A preliminary review by Affiant and other FBI personnel of a Samsung brand external hard drive and a Patriot brand USB drive, which were seized by the FBI from Castano's place of employment, and manufactured outside the state of Texas, reveal numerous images of CV1 in a nude state and/or engaging in sexually explicit conduct. These devices contain images depicting an adult male's penis pressed against the mouth of CV1, who appears to be asleep or incapacitated. A relative of CV1 was shown a sanitized version of one of these images and verified that CV1 is the individual depicted in the image. In addition, this relative identified the bedding shown in this sanitized image as being currently present in Castano's residence. These devices also contain images depicting a pre-pubescent female matching some of the known physical characteristics of CV1, but whose face is not visible in some of the images, with an erect penis placed near her buttocks and anus or in her hand, and some with the child being digitally penetrated. In the background of some of these images is the same bedding that CV1 was observed laying on in other images. Forensic data associated with some of these images

indicates they were potentially produced on or about 2015 and 2016, when CV1 was approximately 12 years old.

8. During the preliminary review of the Samsung brand external hard drive and the Patriot brand USB drive, Affiant and other FBI personnel found multiple child pornography images and videos of another minor female, hereafter referred to as CV2, that appear to have been produced in approximately 2016 when CV2 was approximately 5 months old and continuing until CV2 was approximately 12 months old. Some of the images and videos of CV2 depict the child's mouth on an erect adult penis and an adult using his hand to spread apart the child's vagina. Some of the images depict CV2's bare vagina being lasciviously displayed. Agents sanitized a screen shot from a child pornography video detailed above depicting a fleece blanket and showed it to the mother of CV2 who identified the blanket captured in this image as belonging to the Castano family.

9. Later on August 10, 2022, during a second post-*Miranda* interview that occurred at the FBI building in San Antonio, Texas, Castano was asked about the specific images and or videos of CV1 that are detailed above in this affidavit. Castano subsequently identified her and stated he is the individual who sexually assaulted her and produced those images and videos beginning when CV1 was approximately 10 or 11 years of age. Castano stated he used LG brand cellular phones, as well as an HTC brand cellular phone to produce the images and videos. Neither LG brand nor HTC brand cellular phones are manufactured in the state of Texas.

10. Castano also identified other child pornography files, produced by Castano, that depict children engaged in sexually explicit conduct located by the FBI on his Samsung brand external hard drive and the Patriot brand USB drive. Castano stated he would place sugar on his penis and then place his penis in the mouth of CV2 and produce videos of this conduct. Castano subsequently reviewed a video of Castano engaging in this activity in approximately 2016 with CV2 that was located by the FBI on the Patriot brand USB drive. Castano also identified multiple images of him using his hands to spread apart CV2's vagina in approximately 2016 when CV2 was only a few months old.

11. Castano described how he would change the diaper of two minor females, referred to hereafter as CV3 and CV4, in approximately 2012, when CV3 and CV4 were very young and produce images of the children's bare genitalia. This occurred at the residence of CV3 and CV4


in Schertz, TX. Castano also admitted sneaking into the bedroom where CV3 was sleeping in Castano's current residence in 2019, pulling down her underwear and taking pictures of her buttocks and genital region. Castano subsequently reviewed some of these same images of CV3 with Affiant. These images were located by the FBI on Castano's Patriot brand USB drive. Castano admitted that the last time he produced nude images of CV3 and CV4 were on July 4, 2022, when they were at his house in Universal City. Castano advised Affiant that he used multiple models of LG brand cellular telephones, none of which are manufactured in Texas, to produce the above detailed child pornography images and/or videos of CV2, CV3 and CV4.

12. Castano stated all of the child sexual abuse images located on his devices were produced by him at his current residence in Universal City or at a residence in Schertz, all of which are located within the Western District of Texas.


Application

13. Based on the aforementioned facts, your Affiant respectfully submits that there is probable cause to believe that between approximately 2012 and 2022, **CHRISTOPHER LEE CASTANO**, did knowingly employ, use, persuade, induce, entice, or coerce a minor, to wit CV1, CV2, CV3 and CV4, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and such visual depiction was produced or transmitted using material that have been mailed, shipped or transported in and affecting interstate and foreign commerce, by any means, including by computer, in violation Title 18, United States Code, Section 2251(a).

FURTHER AFFIANT SAYETH NOT,


 Special Agent Larry Baker
 FBI San Antonio
 Crimes Against Children Task Force

Sworn to and subscribed to telephonically on this 11th day of August 2022.


 THE HONORABLE ELIZABETH S. CHESTNEY
 UNITED STATES MAGISTRATE JUDGE
 WESTERN DISTRICT OF TEXAS